

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ALBERT G. HILL, III and ERIN NANCE HILL,

Plaintiffs,

v.

Civil Action No. 3:20-CV-03634

THE ESTATE OF ALBERT G. HILL, JR.,
MARGARET KELIHER, TYREE B. MILLER,
LYDA HILL, HEATHER HILL WASHBURNE,
ELISA HILL SUMMERS, CHESTER J.
DONNALLY, JR. THE ESTATE OF IVAN
IRWIN, JR. CAROL E. IRWIN, and
THOMAS P. TATHAM,

Defendants.

DECLARATION OF W. SCOTT HASTINGS

My name is W. Scott Hastings. I am over 21 years of age, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

1. I am an attorney licensed to practice law in the State of Texas. I am a partner at the law firm of Locke Lord LLP in Dallas, Texas. I have been continuously licensed to practice law since 1997. I am a graduate of Vanderbilt University School of Law. I have practiced business and appellate litigation in Dallas, Texas since 1998, following a judicial clerkship for Judge John Minor Wisdom of the U.S. Court of Appeals for the Fifth Circuit. I am licensed to practice in Texas and Louisiana courts; all federal district courts in Texas and Louisiana, several federal courts of appeals including the Fifth Circuit, and the Supreme Court of the United States.

I. Legal Services Performed by Locke Lord LLP for Margaret Keliher.

2. I am co-counsel for Defendant Margaret Keliher ("***Kelilher***") in the above-styled

civil action filed by Plaintiffs Albert G. Hill, III and Erin Nance Hill (collectively, the “***Plaintiffs***”). I am the billing attorney at Locke Lord LLP for Keliher. I have personal knowledge of the legal services that were rendered by Locke Lord LLP in this civil action, the time it took to render those legal services, and the amount of fees and costs Keliher incurred from Locke Lord LLP for those legal services in this civil action, which are stated in detail in invoices from Locke Lord LLP.

3. Attached hereto as **Exhibit E-1 through Exhibit E-4** are true and correct copies of Invoice Numbers 16538750, 1644552, 1651961, 1656724 from Locke Lord LLP, stating the legal services performed for Keliher by Locke Lord LLP in this civil action, the time it took to perform those legal services, and the amount of fees and costs Keliher incurred for those legal services, which were made contemporaneously when the legal services were rendered. The billing rates Locke Lord LLP charged to Keliher for legal services in this civil action were the standard hourly billing rates Locke Lord LLP charged, which are adjusted from time to time. Accordingly, Locke Lord LLP’s invoices attached hereto as **Exhibit E-1 through Exhibit E-4** state the time worked and detailed descriptions of the legal services performed on a daily basis in this civil action by Locke Lord LLP, which include the tasks summarized in **Table E-1** below. **Exhibit E-1 through Exhibit E-4** are an exact copy of the original invoices from Locke Lord LLP.

TABLE E-1

SUMMARY OF LOCKE LORD LLP’S LEGAL SERVICES

(i) Exhibit E-1: Invoice No. 1638750 (March 2021)

- Analyze Plaintiffs’ Complaint (ECF 1)
- Consider strategy regarding responding to Plaintiffs’ Complaint
- Began reviewing and providing comments on draft motion to dismiss
- Communications with co-counsel and client regarding strategy

(ii) **Exhibit E-2: Invoice No. 1644552 (April 2021)**

- Communications with co-counsel and client regarding strategy
- Provided additional comments on draft motion to dismiss
- Costs for Westlaw research

(iii) **Exhibit E-3: Invoice No. 1651961 (May 2021)**

- Analyzed Plaintiff's response to motion to dismiss
- Communications with co-counsel and client on response

(iv) **Exhibit E-4: Invoice No. 1656724 (June 2021)**

- Analyzed Plaintiff's response to motion to dismiss
- Communications with co-counsel and client on response

II. Fees and Costs Keliher Incurred from Locke Lord LLP

4. **Table E-2** below is a summary of the \$22,755.00 in fees and \$1,132.85 in costs, for a total of \$23,877.85 in fees and costs, for legal services performed for Keliher by Locke Lord LLP in this civil action, as stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**.

TABLE E-2**SUMMARY OF LOCKE LORD LLP'S FEES AND COSTS**

Ex	Invoice No.	Date	Fees	Costs	Total
E-1	1638750	March 15, 2021	\$12,915.00	\$0.00	\$12,915.00
E-2	1644552	April 14, 2021	\$4,715.00	\$1,129.45	\$5,844.45
E-3	1651961	May 17, 2021	\$3,280	\$3.40	\$3,283.40

E-4	1656724	June 14, 2021	\$1,845.00	\$0.00	\$1,845.00
	TOTAL		\$22,755.00	\$1,132.85	\$23,877.85

6. Pursuant to the Texas Supreme Court's opinion in *Rohrmoos Venture v. UTSW DVA Healthcare, LLP*, 578 S.W.3d 469 (Tex. 2019), in preparing each Locke Lord LLP's invoices attached hereto as **Exhibit E-1 through Exhibit E-4**, I analyzed each invoice in an effort to determine a reasonable and necessary fee for each invoice, considering: (1) the particular services performed; (2) who provided those services; (3) approximately when those services were performed; (4) the reasonable amount of time required to perform the services; and (5) the reasonable hourly rate for each person performing such services. *Id.* at 498.

7. The fees and costs Keliher incurred in this civil action were calculated using the lodestar method (*i.e.*, a reasonable number of hours worked multiplied by a reasonable hourly rate). As the Texas Supreme Court has explained, "we intended the lodestar analysis to apply to any situation in which an objective calculation of reasonable hours worked times a reasonable rate can be employed." *Id.* at 498-99. "The lodestar method . . . is a focused and objective analysis of whether the fees sought are reasonable and necessary, yielding a base figure that reflects most *Arthur Andersen*¹ factors and is thus presumptively reasonable." *Id.* at 496. "[T]he lodestar method developed as a 'short hand version' of the *Arthur Andersen* factors and was never intended to be a separate test or method." *Id.* (citing *Stewart Title Guar. Co. v. Sterling*, 822 S.W.2d 1, 10 (Tex. 1991)) ("Although courts should consider several factors when awarding attorney's fees, a short hand version of these considerations is that the trial court may award those fees that are

¹ *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997).

‘reasonable and necessary’ for the prosecution of the suit.”). As the Texas Supreme Court has held, “[c]ontemporaneous billing records are not required to prove that the requested fees are reasonable and necessary.” *Venture*, 578 S.W.3d at 502 (citing *El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757, 763 (Tex. 2012); *City of Laredo v. Montano*, 414 S.W.3d 731, 736 (Tex. 2013) (per curiam) (explaining that “*El Apple* does not hold that a lodestar fee can only be established through time records or billing statements”)). “Nevertheless, billing records are *strongly* encouraged to prove the reasonableness and necessity of requested fees when those elements are contested.” *Venture*, 578 S.W.3d at 502 (emphasis in original).

8. **Table E-3** below is an analysis of the hours I spent performing legal services for Keliher in this civil action, multiplied by my hourly rate, for the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**. That is, **Table E-3** is a lodestar analysis per time keeper at Locke Lord LLP of the hours Keliher incurred for legal services performed by Locke Lord LLP in this civil action as stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**.

TABLE E-3

SUMMARY OF LOCKE LORD LLP’S HOURS BY TIME KEEPER

<u>Time Keeper</u>	<u>Exhibit</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
W. Scott Hastings Attorney/Partner (WSH)	E-1	15.75	\$820.00	\$12,915.00
	E-2	5.75	\$820.00	\$4,715.00
	E-3	4.0	\$820.00	\$3,280.00
	E-4	<u>2.25</u>	\$820.00	<u>\$1,845.00</u>
	Total	27.75		\$22,755.00

9. **Table E-4** below is a summary of the costs Keliher incurred in connection with the legal service Locke Lord LLP performed in this civil action, as stated in detail in the invoices attached as **Exhibit E-1 through Exhibit E-4**.

TABLE E-4**SUMMARY OF COSTS AND EXPENSES**

<u>Exhibit</u>	<u>Amount</u>	<u>Reason</u>
E-2	\$1,129.45	Westlaw legal research
E-3	\$3.40	PACER Search
TOTAL	\$1,132.85	

10. Based on my personal knowledge of the legal services performed for Keliher by Locke Lord LLP in this civil action (as summarized above, and as stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**), I have an opinion as to the legal services rendered in this civil action for Keliher, and what reasonable and necessary fees and costs are in this civil action for them. In reaching my opinion, I have analyzed *inter alia* each of Locke Lord LLP's invoices attached hereto as **Exhibit E-1 through Exhibit E-4**; Federal Rule of Civil Procedure 54(d); the factors identified in the Fifth Circuit's decision in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974); pleadings and filings in this civil action; pleading and filings in other lawsuits involving Al Hill III, the Global Settlement Agreement and the Final Judgment in the 2020 Action, which address the award of attorneys' fees and costs. For example, in connection with preparing this declaration, I have reviewed the Specific Performance clause of the GSA (*i.e.*, Section III, Paragraph 5(r) of the GSA) addressing an award of attorneys' fees and costs, which states:

(r) **Specific Performance**: The Parties agree that monetary damages alone may not be adequate recompense for any breach of this Agreement. **In the event any Party breaches any of the obligations or responsibilities placed upon such Party in this Agreement**, then any other Party may seek any legal

or equitable remedy that may be available for such breach, and, if such Party is successful, then **the Party breaching this Agreement agrees to pay all of the other Parties' reasonable attorneys' fees and costs** of litigation in addition to any legal or equitable damages. The Parties agree that the remedy of specific performance and/or injunctive relief (whether mandatory or by restraint) shall be available for the breach of any term, condition, covenant, or warranty of this Agreement.²

11. It is my opinion that all of the legal services performed by Locke Lord LLP, as stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**, and as analyzed in the **Table E-1 through Table E-4** herein, were reasonable, necessary, and appropriate for this civil action, and all of the fees and costs charged to Keliher for those legal services were reasonable, necessary, and appropriate for this civil action in the Northern District of Texas (Dallas Division), taking into account the nature and complexity of this case, the skill level of the attorneys involved, and other factors discussed below.

12. In my opinion, the legal services performed by Locke lord LLP for Keliher in this civil action, and the \$22,755.00 in fees and \$1,132.85 in costs, for a total of \$23,877.85 in fees and costs, that Keliher incurred in this civil action, as summarized above and as stated in detail in the invoices from Locke Lord LLP attached hereto as **Exhibit E-1 through E-4**, and as analyzed in **Table E-1 through Table E-4** and above, are fair, reasonable and necessary, and equitable and just, under the facts and circumstances of this civil action.

13. As the Texas Supreme Court has determined, “[a] fee is incurred when one becomes liable for it.” *Venture*, 578 S.W.3d at 489 (quoting *Garcia v. Gomez*, 319 S.W.3d 638, 642 (Tex. 2010)). Keliher became liable for the invoices (*i.e.*, incurred the fees and costs) when Locke Lord LLP sent the invoices attached hereto as **Exhibit E-1 through Exhibit E-4** to A.G. Hill Partners, LLC, which is Keliher’s office for purposes of serving as the Independent Executor of the Estate

² 2020 Action ECF 879 at 26-27 § III ¶ 5(r) (emphasis added).

of Al Hill, Jr. All of the fees and costs Locke Lord LLP charged in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4** have been paid to Locke Lord LLP.

III. *Johnson* Analysis of Reasonableness and Necessity.

14. I have evaluated the legal services provided to Keliher in this civil action, the time it took to render those legal services, and the amount of fees and costs Keliher have incurred from Locke Lord LLP, as stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**, and as analyzed in **Table E-1 through E-4** and above, based on the factors identified in the Fifth Circuit's decision in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), the Supreme Court of Texas' decision in *Arthur Andersen & Company v. Perry Equipment Corporation*, 945 S.W.2d 812 (Tex. 1997),³ and Rule 1.04⁴ of the Texas Disciplinary Rules of Professional Conduct, which include:

- (1) the time and labor required;
- (2) the novelty and difficulty of the questions;
- (3) the skill requisite to perform the legal services properly;
- (4) preclusion of other employment by attorney due to acceptance of the case;
- (5) the customary fee;
- (6) whether the fee is fix or contingent;
- (7) time limitations imposed by the client or the circumstances;

³ *Arthur Andersen*, 945 S.W.2d at 818: (“(1) the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal service properly; (2) the likelihood . . . that the acceptance of the particular employment will preclude other employment by the lawyer; (3) the fee customarily charged in [Dallas County, Texas] for similar legal services; (4) the amount involved and the results obtained; (5) the time limitations imposed by the client or by the circumstances; (6) the nature and length of the professional relationship with the client; (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and (8) whether the fee is fix or contingent on results obtained or uncertainty of collection before the legal services have been rendered.”).

⁴ TEX. DISC. R. PROF. CONDUCT 1.04 (“(b) Factors that may be considered in determining the reasonableness of a fee include, but not to the exclusion of other relevant factors, the following: (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly; (2) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer; (3) the fee customarily charged in the locality for similar legal services; (4) the amount involved and the results obtained; (5) the time limitations imposed by the client or by the circumstances; (6) the nature and length of the professional relationship with the client; (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and (8) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.”).

- (8) the amount involved and the results obtained;
- (9) the experience, reputation, and ability of the attorneys;
- (10) the “undesirability” of the case;
- (11) the nature and length of the professional relationship with the client; and
- (12) awards in similar cases.⁵

15. **Factors 1-3: The Time and Labor Required, the Novelty and Difficulty of the Questions, and the Skill Requisite to Perform the Legal Services Properly.** The fees and costs Keliher incurred from Locke Lord LLP are reasonable given the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly. *Johnson*, 448 F.2d at 717-19 (factors 1, 2, and 3). The history and complexity of the litigation initiated by Al Hill III, including the numerous appeals to the Fifth Circuit, warranted input from appellate counsel at the early stage of this proceeding to insure that the issues and record were properly presented to prepare for Al Hill III’s appeal, if he files one again.

17. **Factor 4: The Likelihood . . . that the Acceptance of the Particular Employment Will Preclude Other Employment by the Lawyer.** This factor is neutral. Given the limited amount of time that Locke Lord LLP spent on this matter to date, this matter did not preclude Locke Lord LLP from taking on additional matters or engagements.

18. **Factor 5: The Fee Customarily Charged in the Locality [the Northern District of Texas] for Similar Legal Services.** The fees and costs Keliher incurred in this civil action from Locke Lord LLP. are reasonable and consistent with the attorneys’ fees customarily charged in the Northern District of Texas (Dallas Division) County, Texas for similar legal services. *Johnson*, 448 F.2d at 717-19 (factor 5). I am familiar with the hourly rates charged by Locke Lord LLP and by other firms providing legal services in the Northern District of Texas (Dallas Division), and Locke Lord LLP’s hourly rates for its attorneys are competitive in the market.

⁵ *Johnson*, 448 F.2d at 717-19.

19. Locke Lord LLP invoiced Keliher for the discrete legal services stated in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**, which resulted in the fees and costs Keliher incurred as summarized above in **Table E-2**. The legal services performed by Locke Lord LLP were performed on an hourly basis at the firm's standard rates calculated using the lodestar method as summarized above in **Table E-3**, and for the costs as summarized above in **Table E-4**, and as set forth in detail in the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**.

20. **Factor 6: Whether the Fee is Fixed or Contingent.** The fees and costs Keliher incurred from Locke Lord LLP are reasonable in light of the fact that all fees charged by Locke Lord LLP in this civil action have been based on hourly rates and time actually spent providing legal services to Keliher in this civil action, and they were calculated using the lodestar method. Locke Lord LLP will not receive a bonus or contingent award based on the outcome of this civil action. *Johnson*, 448 F.2d at 717-19 (factor 6).

21. **Factor 7: The Time Limitations Imposed by the Client or by the Circumstances.** This factor is neutral because there are no particularly unusual time limitations that have been imposed by the clients or the circumstances of this civil action. *Johnson*, 448 F.2d at 717-19 (factor 7).

22. **Factor 8: The Amount Involved and the Results Obtained.** The fees and costs Keliher incurred from Locke Lord LLP are reasonable given the amount involved and the results obtained. *Johnson*, 448 F.2d at 717-19 (factor 8). In their Complaint, Plaintiffs contend they are fighting about "hundreds of millions of dollars in assets."⁶ Keliher prevailed in this civil action by obtaining dismissal of all of Plaintiffs' claims with prejudice now. Accordingly, the fees and

⁶ 3634 Action ECF 1 at 1; *see also id.* at 4.

costs Keliher incurred in this civil action are reasonable in light of this factor.

23. **Factor 9: The Experience, Reputation, and Ability of the Lawyers.** The fees and costs Keliher incurred from Locke Lord LLP are reasonable given my experience, reputation, and ability. *Johnson*, 448 F.2d at 717-19 (factor 9). Some of my credentials are set forth at the beginning of this declaration. In addition, I have been recognized as a leading appellate lawyer in Texas in Chambers, D Magazine, and Texas Super Lawyers. I have also argued and won before the U.S. Supreme Court. I have also been recognized and elected to membership in the American Law Institute based on the quality and skill of my work, and reputation. Accordingly, the fees and costs Keliher incurred in this civil action are reasonable in light of this factor.

25. **Factor 11: The Nature and Length of the Professional Relationship with the Client.** The fees and costs Keliher incurred from Locke Lord LLP are reasonable given the nature and length of the professional relationship between me and Keliher. *Johnson*, 448 F.2d 717-19 (factor 11). I have had the privilege of representing Keliher and working with the other counsel in this case for several years, including in the prior appeal by Al III to the Fifth Circuit. The fact that Keliher has continued to retain me as legal counsel on this team demonstrates the fees and costs Locke Lord LLP charged are reasonable in light of the level of the legal services provided.

IV. Business Records: Locke Lord LLP's Invoices, and Summary.

26. As a part of its usual and regular course of business, Locke Lord LLP keeps regular records of legal work performed by its attorneys, such as the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**. In connection with work at Locke Lord LLP, I have become familiar with records kept and maintained by Locke Lord LLP in the usual and regular course of business, namely the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**. I have personal supervision, custody, control, and/or access to the permanent records of Locke Lord LLP as they

pertain to the legal services rendered to Keliher in this civil action. I have examined the records kept and maintained by Keliher in the regular course of its business, namely the invoices attached hereto as **Exhibit E-1 through Exhibit E-4**, and such records reflect certain transactions in the rendering of legal services to Keliher in this civil action by Locke Lord LLP. The entries on these records, a true and correct copy of which are attached hereto as **Exhibit E-1 through Exhibit E-4** were regularly made at or near the time of the transaction, act, or event recorded thereby, and it is a part of the regular course of business of Locke Lord LLP for an employee or a representative of Locke Lord LLP with personal knowledge of such transaction, act, or event to make such memoranda, and to record or transmit information pertaining thereto to be included in such memoranda or records. The invoices attached hereto as **Exhibit E-1 through Exhibit E-4** are kept in the regular course of business of Locke Lord LLP and are permanent records of Locke Lord LLP.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2022.


W. Scott Hastings

EXHIBIT E-1

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

March 15, 2021
Invoice No.: 1638750

Total amount due for the legal services rendered in connection with the
referenced matter through February 28, 2021.

\$12,915.00

File Number: 0107435.00001
RE: Appeal

DATE	ATTY	DESCRIPTION	HOURS	VALUE
02/18/21	WSH	Prepare for and participate in conference call with M. Keliher and D. Turner re: AI III's latest lawsuit.	1.00	820.00
02/23/21	WSH	Review pleadings and proposed strategy on motion to dismiss.	2.25	1,845.00
02/24/21	WSH	Analyze arguments for potential motion to dismiss.	4.00	3,280.00
02/25/21	WSH	Telephone conferences with M. Keliher and D. Turner; draft email re: motion to dismiss strategy.	2.00	1,640.00
02/26/21	WSH	Confer with T. Dees and M. Lang on motion to dismiss strategy; review draft motions to dismiss.	1.00	820.00
02/27/21	WSH	Revise draft motion to dismiss.	4.50	3,690.00
02/28/21	WSH	Review and revise draft motion to dismiss.	1.00	820.00
TOTAL HOURS			15.75	
TOTAL FEES				\$12,915.00

----- **BILLING PROFESSIONALS** -----

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
W. S. Hastings	Partner	820.00	15.75	12,915.00
TIMEKEEPER TOTALS			15.75	\$12,915.00
TOTAL BALANCE DUE				<u>\$12,915.00</u>

PLEASE REMIT PAYMENT:

Via US Mail:

Locke Lord LLP
P.O. Box 911541
Dallas, Texas 75391-1541

Via Courier:

JP Morgan Chase (TX1-0029)
Locke Lord LLP / 301170
14800 Frye Rd.
Fort Worth, Texas 76155

Via Wire:

ABA Routing: 021000021
Swift Code (International): CHASUS33
Account: 00101203546
Bank: JPMorgan Chase Bank, N.A.
712 Main Street, Houston, TX 77002
Reference: LL Invoice Number / Matter

If you wish to remit payment via ACH, please contact the Firm's treasury department at lltreasury@lockelord.com.

Locke Lord LLP will never submit an email to its clients requesting a change to payment remittance instructions. Please contact the Firm's treasury department at lltreasury@lockelord.com or Firm's attorney should you receive such a request.

This statement is due upon receipt. Please call R. W. Roberts of this firm if you have questions concerning legal services covered by this statement, or if you dispute the amount of the statement. Shaun Viau @ (401)276-6481, can answer questions concerning payments on your account. (Please note that this statement covers only those services and expenses described above. It does not include the unpaid balance of any prior statement.)



2200 Ross Avenue
Suite 2800
Dallas, TX 75201
Telephone: (214) 740-8000
Fax: (214) 740-8800
WWW.lockelord.com
Tax ID: 74-1164324

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

March 15, 2021
Invoice No.: 1638750

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through February 28, 2021

File Number: 0107435.00001
RE: Appeal

Total Fees \$12,915.00

Total Due this Statement..... \$12,915.00

PLEASE REMIT PAYMENT:

Via US Mail:
Locke Lord LLP
P.O. Box 911541
Dallas, Texas 75391-1541

Via Courier:
JP Morgan Chase (TX1-0029)
Locke Lord LLP / 301170
14800 Frye Rd.
Fort Worth, Texas 76155

Via Wire:
ABA Routing: 021000021
Swift Code (International): CHASUS33
Account: 00101203546
Bank: JPMorgan Chase Bank, N.A.
712 Main Street, Houston, TX 77002
Reference: LL Invoice Number / Matter

If you wish to remit payment via ACH, please contact the Firm's treasury department at lltreasury@lockelord.com. Locke Lord LLP will never submit an email to its clients requesting a change to payment remittance instructions. Please contact the Firm's treasury department at lltreasury@lockelord.com or Firm's attorney should you receive such a request. This statement is due upon receipt. Please call R. W. Roberts of this firm if you have questions concerning legal services covered by this statement, or if you dispute the amount of the statement. Shaun Viau @ (401)276-6481, can answer questions concerning payments on your account. (Please note that this statement covers only those services and expenses described above. It does not include the unpaid balance of any prior statement.)

EXHIBIT E-2

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

April 14, 2021
Invoice No.: 1644552

Total amount due for the legal services rendered and expenses
incurred in connection with the referenced matter through March 31,
2021. \$5,844.45

File Number: 0107435.00001
RE: Appeal

DATE	ATTY	DESCRIPTION	HOURS	VALUE
03/01/21	WSH	Telephone conference with D. Turner and M. Keliher; revise draft motion to dismiss; draft email to defense group re: comments on the redline.	2.00	1,640.00
03/02/21	WSH	Continue to work on revisions to the motion; participate in full defense group call; telephone conference with T. Dees re: judicial notice and record issues.	2.25	1,845.00
03/03/21	WSH	Review and revise motion to dismiss; review L. Hill's motion to dismiss.	1.50	1,230.00
TOTAL HOURS			5.75	
TOTAL FEES				\$4,715.00

----- **BILLING PROFESSIONALS** -----

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
W. S. Hastings	Partner	820.00	5.75	4,715.00

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
TIMEKEEPER TOTALS			5.75	\$4,715.00

DATE	EXPENSES	VALUE
	Westlaw Research	1,129.45
	TOTAL EXPENSES	\$1,129.45

TOTAL FEES \$4,715.00

TOTAL EXPENSES \$1,129.45

TOTAL FEES AND EXPENSES \$5,844.45

TOTAL BALANCE DUE \$5,844.45

PLEASE REMIT PAYMENT:

Via US Mail:

Locke Lord LLP
 P.O. Box 911541
 Dallas, Texas 75391-1541

Via Courier:

JP Morgan Chase (TX1-0029)
 Locke Lord LLP / 301170
 14800 Frye Rd.
 Fort Worth, Texas 76155

Via Wire:

ABA Routing: 021000021
 Swift Code (International): CHASUS33
 Account: 00101203546
 Bank: JPMorgan Chase Bank, N.A.
 712 Main Street, Houston, TX 77002
 Reference: LL Invoice Number / Matter

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2200 Ross Avenue
Suite 2800
Dallas, TX 75201
Telephone: (214) 740-8000
Fax: (214) 740-8800
WWW.lockelord.com
Tax ID: 74-1164324

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

April 14, 2021
Invoice No.: 1644552

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through March 31, 2021

File Number: 0107435.00001
RE: Appeal

Total Fees \$4,715.00
Total Expenses \$1,129.45
Total Due this Statement..... \$5,844.45

PLEASE REMIT PAYMENT:

Via US Mail:
Locke Lord LLP
P.O. Box 911541
Dallas, Texas 75391-1541

Via Courier:
JP Morgan Chase (TX1-0029)
Locke Lord LLP / 301170
14800 Frye Rd.
Fort Worth, Texas 76155

Via Wire:
ABA Routing: 021000021
Swift Code (International): CHASUS33
Account: 00101203546
Bank: JPMorgan Chase Bank, N.A.
712 Main Street, Houston, TX 77002
Reference: LL Invoice Number / Matter

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EXHIBIT E-3

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

May 17, 2021
Invoice No.: 1651961

Total amount due for the legal services rendered and expenses
incurred in connection with the referenced matter through April 30,
2021. \$3,283.40

File Number: 0107435.00001
RE: Appeal

DATE	ATTY	DESCRIPTION	HOURS	VALUE
04/12/21	WSH	Review Plaintiffs' response to the motion to dismiss.	0.50	410.00
04/14/21	WSH	Analyze Plaintiffs' arguments in response to motion to dismiss.	1.00	820.00
04/15/21	WSH	Analyze Hill III's response; participate in telephone conference with M. Keliher and D. Turner; draft notes to circulate to the defense team.	2.00	1,640.00
04/24/21	WSH	Review draft reply brief inserts.	0.25	205.00
04/27/21	WSH	Review L. Hill's reply brief.	0.25	205.00
TOTAL HOURS			4.00	
TOTAL FEES				\$3,280.00

----- **BILLING PROFESSIONALS** -----

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
W. S. Hastings	Partner	820.00	4.00	3,280.00

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
TIMEKEEPER TOTALS			4.00	\$3,280.00

DATE	EXPENSES	VALUE
	PACER Online Research	3.40
	TOTAL EXPENSES	\$3.40

TOTAL FEES \$3,280.00

TOTAL EXPENSES \$3.40

TOTAL FEES AND EXPENSES \$3,283.40

TOTAL BALANCE DUE \$3,283.40

PLEASE REMIT PAYMENT:

Via US Mail:

Locke Lord LLP
 P.O. Box 911541
 Dallas, Texas 75391-1541

Via Courier:

JP Morgan Chase (TX1-0029)
 Locke Lord LLP / 301170
 14800 Frye Rd.
 Fort Worth, Texas 76155

Via Wire:

ABA Routing: 021000021
 Swift Code (International): CHASUS33
 Account: 00101203546
 Bank: JPMorgan Chase Bank, N.A.
 712 Main Street, Houston, TX 77002
 Reference: LL Invoice Number / Matter

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2200 Ross Avenue
Suite 2800
Dallas, TX 75201
Telephone: (214) 740-8000
Fax: (214) 740-8800
WWW.lockelord.com
Tax ID: 74-1164324

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

May 17, 2021
Invoice No.: 1651961

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through April 30, 2021

File Number: 0107435.00001
RE: Appeal

Total Fees \$3,280.00
Total Expenses \$3.40
Total Due this Statement..... \$3,283.40

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EXHIBIT E-4

Margaret Keliher, as Independent Executor of the
47 Highland Park Village
Suite 200
Dallas, TX

June 14, 2021
Invoice No.: 1656724

Total amount due for the legal services rendered in connection with the
referenced matter through May 31, 2021. \$1,845.00

File Number: 0107435.00001
RE: Appeal

DATE	ATTY	DESCRIPTION	HOURS	VALUE
05/03/21	WSH	Review and edit the reply brief.	0.50	410.00
05/04/21	WSH	Revise reply brief in support of motion to dismiss.	0.50	410.00
05/05/21	WSH	Telephone conference with D. Turner and M. Keliher re: reply brief; telephone conference with B. Mason; review and edit reply brief.	1.25	1,025.00
TOTAL HOURS			2.25	
TOTAL FEES				\$1,845.00

----- **BILLING PROFESSIONALS** -----

TIMEKEEPER	CLASS	RATE	HOURS	VALUE
W. S. Hastings	Partner	820.00	2.25	1,845.00
TIMEKEEPER TOTALS			2.25	\$1,845.00
TOTAL BALANCE DUE				<u>\$1,845.00</u>

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June 14, 2021
Invoice No.: 1656724

REMITTANCE ADVICE

Total amount due for the legal fees and expenses rendered in connection with the referenced matter through May 31, 2021

File Number: 0107435.00001
RE: Appeal

Total Fees \$1,845.00

Total Due this Statement..... \$1,845.00

PLEASE REMIT PAYMENT:

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